LAW OFFICES OF D. SCOTT DATTAN 2600 Denali Street, Suite 460 Anchorage, Alaska 99503 Phone: (907) 276-8008

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
Plaintiff,)
VS.)
CARLOS RAINEY, et al)
Defendant.))) Case No. 3:05-cr-108-JWS
) Case INU. 3.03-C1-100-J W S

DEFENDANT'S SUPPLEMENTAL JURY INSTRUCTION

Defendant Shannon Rainey, by and through her attorney D. Scott Dattan, submitted proposed jury instructions on May 24, 2006 (document 284). In addition to those jury instructions, it may be necessary to give pattern jury instruction 6.5. The reasoning for this jury instruction is contained in Defendant's Supplemental Trial Brief.

DATED this 18th day of August, 2006.

s/D. Scott Dattan

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2006, a copy of foregoing DEFENDANT'S SUPPLEMENTAL JURY INSTRUCTION was served electronically on: Stephan Collins, Mike Dieni, Allan Beiswenger, William Carey, John C. Pharr, Scott Sterling, Lance Wells, T. Burke Wonnell, Mark Rosenbaum, Raul Martinez, and Hugh Fleischer.

s/D.Scott Dattan